

Message

From: Smith, DavidW [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=911849B6D8DB4194AC6D4B69051E3B74-DSMITH06]
Sent: 11/27/2018 10:01:55 PM
To: Fitzgerald, Rebecca [Rebecca.Fitzgerald@waterboards.ca.gov]
CC: Stuber, Robyn [Stuber.Robyn@epa.gov]; Denton, Debra [Denton.Debra@epa.gov]
Subject: Heads up on EPA comments at tomorrow's hearing

Hi Rebecca- I wanted to give you a heads up that Robyn Stuber will be providing oral comments at the hearing tomorrow about the Tox Plan. We are generally very supportive, but will identify 3 areas where we believe the plan should be clarified or revised:

- suggest revising section stating that the objectives cannot be the basis for stormwater numeric effluent limitations.
- clarify the section that appears to provide discretion to set receiving water limits instead of effluent limits.
- clarify how compliance with both MMELs and MDELs will be monitored and measured.

We look forward to discussing these issues with you after the comment period closes. We expect to provide written comments by 12/7 to elaborate, and to note a few areas with tiny issues. Thanks, and good luck

David Smith
Manager
Water Quality Assessment Section (WTR-2-1)
U.S. EPA Region 9
75 Hawthorne Street
San Francisco, CA 94602
(415) 972-3464 (office)
(415) 972-947-3545 (fax)